ISAACSON, ROSENBAUM, WOODS & LEVY, P.C.
ATTORNEYS & COUNSELORS AT LAW

STANTON D. ROSENBAUM
GARY A. WOODS
SAMUEL L. LEVY
STEVEN G. WRIGHT
RICHARD D. GREENGARD
EDWARD T. RAMEY
WILLIAM M. SILBERSTEIN
LAWRENCE J. DONOVAN, JR.
GARY LOZOW
LAWRENCE R. KUETER
JONATHAN H. STEELER

SHELDON E. FRIEDMAN
MARK G. GRUESKIN
GARY A. KLEIMAN
JON R. TANDLER
BARRY PERMUT
RICHARD M. PETKUN
NEIL B. OBERFELD
JOHN A. CHANIN
THERESA L. CORRADA
PAMELA A. JOHNSON
BLAIN D. MYHRE

PAULA J. WILLIAMS
STACEY STERN CHAPMAN
ALISON T. DODSON
LISA D. L. WILLIAMS
DEREK C. WEST
LISA R. BRENNER
T. BARTON FRENCH, JR.
RICHARD A. HARDAWAY
BRADLEY A. BECK
LISA C. WALTER
BONNIE LARSON-de PAZ

KELLY ELEFANT
CHRISTINE L. HAYES
MATTHEW D. PLUSS

TIMOTHY P. DALY OF COUNSEL
PAUL V. FRANKE SPECIAL COUNSEL
SANDY GAIL NYHOLM OF COUNSEL

LOUIS G. ISAACSON (1910-1993)
CHARLES ROSENBAUM (1901-1973)
SAMUEL M. GOLDBERG (1903-1974)
JOSEPH J. STOLLAR (1946-1984)

SENDER'S DIRECT DIAL
(303) 256-3986

SENDER'S INTERNET ADDRESS
jsteeler@irwl.com

December 26, 2001

HAND DELIVER
Ms. Dawn Tesorero
Technical Enforcement Program
U.S. Environmental Protection Agency
999 18th Street, Suite 300
Denver, CO 80202-2466

Re: First Request for Information Pursuant to § 104 of CERCLA for the Vasquez Boulevard/I-70 Site, Denver, Colorado

Dear Ms. Tesorero:

On behalf of Pepsi Bottling Group ("PBG"), the attached is intended to supplement PBG's earlier responses to the above-referenced information request. In earlier submittals, PBG has informed your office of on-going expansion work at the PBG facility. As part of this work, excavation activities have been undertaken. Pursuant to PBG's work plan, PBG had air monitoring performed to assure a safe working environment.

Responsive to question 9(h) of the above-referenced information request, attached hereto is an air monitoring report. The results from the sampling indicate that levels were well below OSHA action levels.

If you have any questions regarding this letter or need further information (including further certification), please advise the undersigned.

Very truly yours,

Jonathan H. Steeler

JHS:jkw
Enclosure 512706
cc: David H. Patrick, Esq.
Dennis H. Hunter, Ph.D.

Harding ESE
A MACTEC COMPANY

Harding ESE, Inc.
1627 Cole Boulevard
Golden, CO 80401

Telephone: 303/292-5365
Fax: 303/292-5411
Home Page: www.mactec.com

December 17, 2001

Mr. Chris Scheib
Exemplar International
6300 East 75th Street, Suite 170
Indianapolis, IN 46250

Final Report
Industrial Hygiene Monitoring
Pepsi Bottling Company

Dear Mr. Scheib:

This report presents the results of Harding ESE's industrial hygiene monitoring for airborne lead and arsenic for the construction renovation project at the Pepsi Bottling Group (PBG) Facility, 3801 Brighton Boulevard, Denver, Colorado. The employee exposure monitoring occurred as outlined in Harding ESE's proposal dated October 29, 2001, to Exemplar International. The purpose of the monitoring was to determine if employee exposures to airborne lead and arsenic exceed the Occupational Safety and Health Administration's (OSHA's) Permissible Exposure Limits (PEL's) or the American Conference of Governmental Industrial Hygienists' (ACGIH's) Threshold Limit Vaules (TLVs).

BACKGROUND

The PBG Facility is located on the corner of 38th Street and Brighton Boulevard, in Denver, Colorado. Historically, the area near the facility was a major smelting center for the Rocky Mountain Region. Three smelting plants operated from the 1870's through the present, refining gold, silver, copper, lead and zinc. Only one is still in operation today, refining metals. On January 1999, the area was proposed by the EPA to be added to the Superfund National Priorities List.

PBG planned to expand their facility starting in November 2001. Because of the history, PBG wanted to maintain a safe work environment during construction, and Harding ESE was contracted to collect representative air samples during substantial excavation activities to obtain information on possible lead and arsenic in air during the renovation.

OVERVIEW

Harding ESE evaluated the presence of lead and arsenic by collecting one ambient sample and 19 eight-hour time weighted average (TWA) samples in the breathing zones of workers. It should be noted that the construction contractors were required to utilize effective engineering controls for fugitive dust during excavation activities. The following is a synopsis of the samples collected for lead and arsenic:

- November 6th: 2 personal samples, 1 ambient sample, and 1 QC blank submitted for analysis.
- November 7th: 2 personal samples and 1 QC blank submitted for analysis.

- November 12th: 2 personal samples and 1 QC blank submitted for analysis.
- November 16th: 1 personal sample collected.
- November 19th: 4 personal samples and 1 QC blank submitted for analysis.
- November 20th: 3 personal samples submitted and 1 QC blank for analysis.
- November 29th: 3 personal samples collected.
- November 30th: 6 personal samples and 1 QC blank submitted for analysis

After November 30, 2001, major excavation operations for the construction ceased. Therefore, no air monitoring samples were collected after that date.

METHODS AND RESULTS

Review of Operations

Prior to each shift Harding ESE reviewed the schedule of construction activities. Workers were selected for monitoring based on the probability of being exposed to dust emissions during their daily operations. The higher risk groups (laborers on the ground, equipment operators, truck drivers) were selected to establish worse case scenarios for potential exposure to airborne lead and arsenic. Documentation of worker activities and weather conditions were made throughout the duration of the sampling period to assist in assessing potential exposures.

Exposure Air Monitoring

Based on observations and employee interviews, Harding ESE determined that the following employees had the greatest potential exposure to lead and arsenic.

- Employees applying water to dusty areas with a hose
- The laborers on the ground working near the excavation
- Heavy equipment operators
- Truck drivers

These samples are representative of work activities at the site. Samples were collected in various locations and on different workers to insure that accurate data was obtained.

Air samples were taken each day using Gillian Gilair-5 personal sampling pumps. The pumps were fitted with cassettes containing 0.8μm cellulose ester filters. Each pump was pre- and post-calibrated to

approximately 2.0L min^{-1} using a primary standard DryCal calibrator and the results were within +/- 5%. The cassettes were attached to the employees by flexible Tygon tubing and placed in the breathing zone of each worker. Once the shift had ended, the cassettes were collected and post-calibrated. Samples were then submitted to Galson Laboratories, an American Industrial Hygiene Association (AIHA) accredited lab, via FedEx overnight service and standard chain of custody procedures. Galson analyzed the air samples using NIOSH Method 7300 Elements by ICP.

Results

The laboratory analytical results were compared to the OSHA PEL, reviewed with the employees, and posted at the job site. Four of the 19 personal samples contained Lead above the method detection limit (1107-72607, 1112-72773, 1116-72768, 1119-72511) and one sample (1107-72607) contained arsenic above the detection limit. The ambient samples along with the quality-controlled blanks were all non-detect. The results of these exposure samples indicated that airborne concentrations of the analyzed metals did not exceed OSHA's PEL's. Quantitative air monitoring results are presented in Table 1. The laboratory report and chain of custody records are attached.

Sample Number	Person/Task/ Date	Air Concentration ($\mu g\ m^{-3}$)	Occupational Safety and Health Administration Permissible Exposure Limit (PEL)
1106-72771	Travis Snyder Water Truck Driver 11/6/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1106-72772	Claude Harris Loader Operator 11/6/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1106-72473	Ambient 11/6/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 g m^{-3} arsenic
1107-72488	Travis Snyder Water Truck Driver 11/7/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1107-72607	Claude Harris Loader Operator 11/7/01	1.22 lead 0.23 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1112-72747	Claude Harris Loader Operator 11/12/01	<0.6 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1112-72773	Mario Nunez Labor 11/12/01	0.44 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1116-72768	Travis Snyder Water Truck Driver 11/16/01	0.72 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic

Sample Number	Person/Task/ Date	Air Concentration ($\mu g\ m^{-3}$)	Occupational Safety and Health Administration Permissible Exposure Limit (PEL)
1119-72511	Mike Jordan Carpenter 11/19/01	0.45 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1119-72673	Claude Harris Loader Operator 11/19/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1119-72633	Travis Snyder Water Truck Driver 11/19/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1120-72609	Fidencio Ramieriz Laborer 11/20/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1120-72625	Santagio Flores Laborer 11/20/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1120-72522	Tony Tafoya Backhoe Operator 11/20/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1129-72648	Rex Wise Crew Forman 11/29/01	<0.4 lead <0.1 arsenic	50 $\mu g\ m^{-3}$ lead 10 ug m^{-3} arsenic
1129-72712	Fidencio Ramieriz Laborer 11/29/01	<0.4 lead <0.1 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1129-72657	Danie Leln Skid Steer Operator 11/29/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1130-72718	Claude Harris Loader Operator 11/30/01	<0.5 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 ug m^{-3} arsenic
1130-72709	Quintin Danzinger Laborer 11/30/01	<0.4 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic
1130-72710	Mario Walker Fork lift Operator 11/30/01	<0.5 lead <0.2 arsenic	50 $\mu g\ m^{-3}$ lead 10 $\mu g\ m^{-3}$ arsenic

OSHA Action Levels: lead (30 $\mu g\ m^{-3}$), arsenic (5 $\mu g\ m^{-3}$)
Detection Limits: lead (0.4 to 0.5 $\mu g\ m^{-3}$), arsenic (0.1 to 0.2 $\mu g\ m^{-3}$)

CONCLUSIONS

All results were found to be well below OSHA's action levels of 30 ug m^{-3} for lead and 5 ug m^{-3} for arsenic. The action levels and permissible exposure levels can be referenced at 29 CFR 1910.1025 (lead) and 29 CFR 1910.1018 (arsenic). On this basis and Harding ESE's evaluation of exposure hazards, no respiratory protection related to employee exposures to lead and arsenic is required. However, engineering controls for dust suppression should continue to be used during all excavation activities.

LIMITATIONS

This report was prepared for Exemplar International and there clients, Environmental Consulting Group and PBG. No other party may rely on the results, conclusions, or recommendation contained in this report without the express permission of Harding ESE. Please note that if facility conditions, materials, personnel, or equipment change, potential health and safety hazards could change. For example, prior to the next construction phase when large intrusive or excavation activities begin, the need to conduct additional monitoring should be evaluated in order to maintain a safe work environment, with no or low potential for employee exposures to airborne lead or arsenic.

If you have any questions or require additional information please contact either of the undersigned at (303) 292-5365.

Sincerely,

HARDING ESE

Bradley R. Steininger
Project Safety and Industrial Hygiene Specialist

Holli L. Merchant, CIH
Associate Industrial Hygienist

BRS/HLM/cgh
P/Group/WP/Letters/Scheib-01

Attachments: Laboratory Reports and Chain of Custody Records

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

November 08, 2001

DOH ELAP# 11626

Mr. Brad Steininger
Harding ESE
1627 Cole Boulevard
Denver, CO 80401

Client Account# 13461 Login# L76367

Dear Mr. Steininger:

Enclosed are the analytical results of the samples received by our laboratory November 07, 2001.

Results in this report are based on the sampling data provided by the client. Unless otherwise requested, all samples will be discarded thirty days from the date of this report.

We strive to make our reporting format clear and understandable and hope you are thoroughly satisfied with our services.

Galson Laboratories is uniquely qualified to meet your needs for accurate and timely industrial hygiene analyses. Accredited by the American Industrial Hygiene Association since 1976, we perform all analyses according to NIOSH or OSHA-approved analytical methods. Galson Laboratories is committed to providing quality analyses and exceptional customer service.

Please contact your client service representative, Ed Stuber at (888) 577-5227, extension 251, if you would like any additional information regarding this report.

Thank you for using Galson Laboratories.

Sincerely,

Galson Laboratories

F. Joseph Unangst
Laboratory Director

Enclosure(s)

Galson Laboratories

6601 Kirkville Road
P.O. Box 369
E. Syracuse, NY 13057
Tel: (315) 437-7252 888-577-Labs (5227)
Fax: (315) 437-0571

Request For Industrial Hygiene Analysis

Company Name: Harding ESE

Site Name: Rep. Bowling Green

Sampled By: Jeremy Sawyer | Project #:

Send Report to: Brad Steininger
1627 Cole Blvd
Denver, CO 80401
Fax # 303-292-5411

Invoice to: Exemplar International
Attn: Chris Scheib

☐ Purchase order number _____
(or)
☐ Credit Card (type) _____ Card # _____ Exp Date _____
☒ Verbal Authorization Chris Scheib

~~☒ Standard Turn-Around Time per Ed (CM)~~ OR ☒ Rush: Date and Time Requested: 11/08/01 am pm per Ed

☐ Phone Results to: _____ Phone # ( ) - - ext.

☒ Fax Results to: 303-292-5411 Fax # ( ) - -

☐ Email Results to: _____

Sample Identification	Date Sampled	Sample Medium Catalog # / Lot #	Air Sample Volume (liters)*	Analysis Requested	Method Reference
~~P5C#106 72771~~	~~11/06/01~~				
72771	11/06/01	Mixed Ester 0.8u MCE	931.69	Pb / Arsenic	NIOSH 7300
72772	11/06/01	Mixed Ester 0.8u MCE	857.72	Pb / Arsenic	NIOSH 7300
72773	11/06/01	Mixed Ester 0.8u MCE	902.88	Pb / Arsenic	NIOSH 7300
72732	11/06/01	Mixed Ester 0.8u MCE	0	Pb / Arsenic	NIOSH 7300
~~VOID 72573~~	~~11/06/01~~	~~Mixed Ester 0.8u MCE~~	~~0~~	~~Pb / Arsenic~~	~~NIOSH 7300~~

as per chris scheib to Ed 11/7 (CM)

11/06/01

Chris Scheib to Ed 11/7 (CM)
no dust as per
Charge ND (10%) surcharge per Ed

*For passive monitors please list time exposed in minutes.

Comments (Please list any known interferences present in sampling area): _____

Chain of Custody	Print Name	Signature	Date/Time
Relinquished by:	Jeremy Sawyer		11/7/01 Fisher
Received by LAB.	M. Krause	M. Krause	11/7/01 10:15

Samples received after 3pm will be considered on next day's business.

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE-Pepsi Bottling

Date Sampled : 06-NOV-01
Date Received : 07-NOV-01
Date Analyzed : 07-NOV-01

Account No.: 13461
Login No. : L76367

Arsenic

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
72771	L76367-1	0.93169	<0.15	<0.2
72772	L76367-2	0.85748	<0.15	<0.2
72473	L76367-3	0.90288	<0.15	<0.2
72732 BLANK	L76367-4	NA	<0.15	NA

Level of quantitation: 0.15 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : see 29CFR 1910.1018
Collection Media : Filter

Submitted by: SR
Approved by : JK
Date : 08-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE-Pepsi Bottling

Date Sampled : 06-NOV-01
Date Received : 07-NOV-01
Date Analyzed : 07-NOV-01

Account No.: 13461
Login No. : L76367

Inorganic Lead

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
72771	L76367-1	0.93169	<0.38	<0.4
72772	L76367-2	0.85748	<0.38	<0.4
72473	L76367-3	0.90288	<0.38	<0.4
72732 BLANK	L76367-4	NA	<0.38	NA

Level of quantitation: 0.38 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : 50 ug/m3
Collection Media : Filter

Submitted by: SR
Approved by : JK
Date : 08-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

November 08, 2001

DOH ELAP# 11626

Mr. Brad Steininger
Harding ESE
1627 Cole Boulevard
Denver, CO 80401

Client Account# 13461 Login# L76390

Dear Mr. Steininger:

Enclosed are the analytical results of the samples received by our laboratory November 08, 2001.

Results in this report are based on the sampling data provided by the client. Unless otherwise requested, all samples will be discarded thirty days from the date of this report.

Please contact your client service representative, Ed Stuber at (888) 577-5227, extension 251, if you would like any additional information regarding this report.

Thank you for using Galson Laboratories.

Sincerely,

Galson Laboratories

FOR.

F. Joseph Unangst
Laboratory Director

Enclosure(s)

Galson Laboratories

6601 Kirkville Road
P.O. Box 369
E. Syracuse, NY 13057
Tel: (315) 437-7252 888-577-Labs (5227)
Fax: (315) 437-0571

Request For Industrial Hygiene Analysis

Company Name: Harding ESE

Site Name: Pepsi Bottling Group

Sampled By: Jeremy Sawyer | Project #:

Send Report to: Brad Steininger
1627 Cole Blvd
Denver, CO 80401
Fax 303-292-5411

Invoice to: Exemplar International
Attn: Chris Scheib

☐ Purchase order number _____
(or)
☐ Credit Card (type) _____ Card # _____ Exp Date _____
☒ Verbal Authorization Chris Scheib

☐ Standard Turn-Around Time OR ☒ Rush: Date and Time Requested: 11/08/ 5 am (pm)

☐ Phone Results to: _____ Phone # ( ) - - ext.

☐ Fax Results to: _____ Fax # (303) - 292 - 5411

☐ Email Results to: _____

Sample Identification	Date Sampled	Sample Medium Catalog # / Lot #	Air Sample Volume (liters)*	Analysis Requested	Method Reference
72488	11/7/01	Match 0.8 MCE	913.900	Pb / Arsenic	Element ICP Method 7306
72607	11/7/01	Match 0.8 MCE	896.995	Pb / Arsenic	Element ICP Method 7300
72552	11/7/01	Match 0.8 MCE	0	Pb / Arsenic	Element ICP Method 7300

11/07/01

*For passive monitors please list time exposed in minutes.

Comments (Please list any known interferences present in sampling area): No blast necessary per Ed 11/8 JM

Chain of Custody	Print Name	Signature	Date/Time
Relinquished by:	Jeremy Sawyer		11/07/01 Fedex
Received by LAB.	M. Krause	M. Krause	11/8/01 7:55

Samples received after 3pm will be considered as next day's business.

LAB ORIGINAL

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE/Pepsi Bottling

Date Sampled : 07-NOV-01
Date Received : 08-NOV-01
Date Analyzed : 08-NOV-01

Account No.: 13461
Login No. : L76390

Arsenic

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
72488	L76390-1	0.913900	<0.15	<0.2
72607	L76390-2	0.896995	0.210	0.23
72552 BLANK	L76390-3	NA	<0.15	NA

Level of quantitation: 0.15 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : see 29CFR 1910.1018
Collection Media : Filter

Submitted by: LK
Approved by : JK
Date : 08-NOV-01
QC by:
NYS DOH #: 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE/Pepsi Bottling

Date Sampled : 07-NOV-01
Date Received : 08-NOV-01
Date Analyzed : 08-NOV-01

Account No.: 13461
Login No. : L76390

Inorganic Lead

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
72488	L76390-1	0.913900	<0.38	<0.4
72607	L76390-2	0.896995	1.22	1.4
72552 BLANK	L76390-3	NA	<0.38	NA

Level of quantitation: 0.38 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : 50 ug/m3
Collection Media : Filter

Submitted by: LK
Approved by : JK
Date : 08-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

November 13, 2001

DOH ELAP# 11626

Mr. Brad Steininger
Harding ESE
1627 Cole Boulevard
Denver, CO 80401

Client Account# 13461 Login# L76529

Dear Mr. Steininger:

Enclosed are the analytical results of the samples received by our laboratory November 13, 2001.

Results in this report are based on the sampling data provided by the client. Unless otherwise requested, all samples will be discarded thirty days from the date of this report.

Please contact your client service representative, Ed Stuber at (888) 577-5227, extension 251, if you would like any additional information regarding this report.

Thank you for using Galson Laboratories.

Sincerely,

Galson Laboratories

F. Joseph Unangst
Laboratory Director

Enclosure(s)

Galson Laboratories

6601 Kirkville Road
P.O. Box 369
E. Syracuse, NY 13057
Tel: (315) 437-7252 888-577-Labs (5227)
Fax: (315) 437-0571

Request For Industrial Hygiene Analysis

Company Name: Harding ESE

Site Name: Pepsi Bottling Group

Sampled By: Jeremy Sawyer | Project #:

Send Report to: Brad Steininger
1627 Cole Blvd.
Denver, CO 80401

Invoice to: Exemplar International
Attn: Chris Scheib

☐ Purchase order number _____
(or)
☐ Credit Card (type) _____ Card # _____ Exp Date _____
☒ Verbal Authorization chris Scheib

☐ Standard Turn-Around Time OR ☒ Rush: Date and Time Requested: 11 / 13 / 5 am (pm)

☐ Phone Results to: _____ Phone # ( ) - - ext.

☐ Fax Results to: _____ Fax # (303) - 292 - 5411

☐ Email Results to: _____

Sample Identification	Date Sampled	Sample Medium Catalog # / Lot #	Air Sample Volume (liters)*	Analysis Requested	Method Reference
72747	11/12/01	IPC Match 0.8u MCE	649.8L	Pb / Arsenic	Element ICP Method 7300
72681	11/12/01	Match 0.8u MCE	886.9L	Pb / Arsenic	Element ICP Method 7300
72773	11/12/01	Match 0.8u MCE	0	Pb / Arsenic	Element ICP Method 7300

11/12/01

*For passive monitors please list time exposed in minutes.

Comments (Please list any known interferences present in sampling area): _____

Chain of Custody	Print Name	Signature	Date/Time
Relinquished by:	Jeremy Sawyer		11/12/01 Fedex
Received by LAB.	Charlene Moser		11/13/01 8:30

Samples received after 3pm will be considered as next day's business.

LAB ORIGINAL

Galson Laboratories
6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE-Pepsi Bottling

Date Sampled : 12-NOV-01
Date Received : 13-NOV-01
Date Analyzed : 13-NOV-01

Account No.: 13461
Login No. : L76529

Arsenic

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
72747	L76529-1	0.6498	<0.15	<0.2
72681	L76529-2	0.8869	<0.15	<0.2
72773 BLANK	L76529-3	NA	<0.15	NA

Level of quantitation: 0.15 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : see 29CFR 1910.1018
Collection Media : Filter

Submitted by: JK
Approved by : AMW
Date : 13-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories
6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE-Pepsi Bottling

Date Sampled : 12-NOV-01
Date Received : 13-NOV-01
Date Analyzed : 13-NOV-01

Account No.: 13461
Login No. : L76529

Inorganic Lead

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
72747	L76529-1	0.6498	<0.38	<0.6
72681	L76529-2	0.8869	0.390	0.44
72773 BLANK	L76529-3	NA	<0.38	NA

Level of quantitation: 0.38 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : 50 ug/m3
Collection Media : Filter

Submitted by: JK
Approved by : AMW
Date : 13-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

November 20, 2001

DOH ELAP# 11626

Mr. Brad Steininger
Harding ESE
1627 Cole Boulevard
Denver, CO 80401

Client Account# 13461 Login# L76750

Dear Mr. Steininger:

Enclosed are the analytical results of the samples received by our laboratory November 20, 2001.

Results in this report are based on the sampling data provided by the client. Unless otherwise requested, all samples will be discarded thirty days from the date of this report.

Please contact your client service representative, Ed Stuber at (888) 577-5227, extension 251, if you would like any additional information regarding this report.

Thank you for using Galson Laboratories.

Sincerely,

Galson Laboratories

F. Joseph Unangst
Laboratory Director

Enclosure(s)

Galson Laboratories

6601 Kirkville Road
P.O. Box 369
E. Syracuse, NY 13057
Tel: (315) 437-7252 888-577-Labs (5227)
Fax: (315) 437-0571

Request For Industrial Hygiene Analysis

Company Name: Harding ESE
Site Name: Pepsi Bottling Group
Sampled By:
Project #: ~~[illegible]~~ BRJ

Send Report to: Brad Steininger
1627 Cole Blvd
Denver, CO 80401

Invoice to: Exemplar International
Att: Chris Scheib

☐ Purchase order number
(or)
☐ Credit Card (type) Card # Exp Date
☐ Verbal Authorization

☐ Standard Turn-Around Time OR ☒ Rush: Date and Time Requested: 11/20/ 5 am (pm)
☐ Phone Results to: Phone # ( ) - - ext.
☐ Fax Results to: Fax # (303) - 292 - 5411
☐ Email Results to:

Sample Identification	Date Sampled	Sample Medium Catalog # / Lot #	Air Sample Volume (liters)*	Analysis Requested	Method Reference
11-16-72768	11/16/01	Match 0.8µMCE	827	PB/Arsenic	Element ICP Method T300
11-19-72775	11/19/01	↓	—	↓	↓
11-19-72673	11/19/01		925.35		
11-19-72633	11/19/01		983.25		
11-19-72511	11/19/01		932.10		

*For passive monitors please list time exposed in minutes.

Comments (Please list any known interferences present in sampling area):

Chain of Custody	Print Name	Signature	Date/Time
Relinquished by:	Matt Grant		11/19/01 - 1518
Received by LAB.	M. Krause	M. Krause	11/20/01 7:45

Samples received after 3pm will be considered as next day's business.

LAB ORIGINAL

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Pepsi Bottling Group
Project No. : BRJ

Date Sampled : 16-NOV-01 - 19-NOV-01 Account No.: 13461
Date Received : 20-NOV-01 Login No. : L76750
Date Analyzed : 20-NOV-01

Arsenic

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
11-16-72768	L76750-1	0.827	<0.15	<0.2
11-19-72775 BLANK	L76750-2	NA	<0.15	NA
11-19-72673	L76750-3	0.92535	<0.15	<0.2
11-19-72633	L76750-4	0.98325	<0.15	<0.2
11-19-72511	L76750-5	0.93210	<0.15	<0.2

Level of quantitation: 0.15 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : see 29CFR 1910.1018
Collection Media : Filter

Submitted by: JK
Approved by : AMW
Date : 20-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than mg -Milligrams m3 -Cubic Meters kg -Kilograms
> -Greater Than ug -Micrograms l -Liters NS -Not Specified
NA -Not Applicable ND -Not Detected ppm -Parts per Million

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Pepsi Bottling Group
Project No. : BRJ

Date Sampled : 16-NOV-01 - 19-NOV-01 Account No.: 13461
Date Received : 20-NOV-01 Login No. : L76750
Date Analyzed : 20-NOV-01

Inorganic Lead

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
11-16-72768	L76750-1	0.827	0.600	0.72
11-19-72775 BLANK	L76750-2	NA	<0.38	NA
11-19-72673	L76750-3	0.92535	<0.38	<0.4
11-19-72633	L76750-4	0.98325	<0.38	<0.4
11-19-72511	L76750-5	0.93210	0.420	0.45

Level of quantitation: 0.38 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : 50 ug/m3
Collection Media : Filter

Submitted by: JK
Approved by : AMW
Date : 20-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

November 26, 2001

DOH ELAP# 11626

Mr. Brad Steininger
Harding ESE
1627 Cole Boulevard
Denver, CO 80401

Client Account# 13461 Login# L76839

Dear Mr. Steininger:

Enclosed are the analytical results of the samples received by our laboratory November 26, 2001.

Results in this report are based on the sampling data provided by the client. Unless otherwise requested, all samples will be discarded thirty days from the date of this report.

Please contact your client service representative, Ed Stuber at (888) 577-5227, extension 251, if you would like any additional information regarding this report.

Thank you for using Galson Laboratories.

Sincerely,

Galson Laboratories

F. Joseph Unangst
Laboratory Director

Enclosure(s)

Galson
Laboratories
6601 Kirkville Road
P.O. Box 369
E. Syracuse, NY 13057
Tel: (315) 437-7252 888-577-Labs (5227)
Fax: (315) 437-0571

Request For Industrial Hygiene Analysis

Company Name: Harding ESE
Site Name: Pepsi Bottling Group
Sampled By: Matt Grant | Project #:

Send Report to: Brad Steininger
1627 Cole Blvd.
Golden, CO 80401

Invoice to: Exemplar International
Attn: Chris Scheib

☐ Purchase order number _____
(or)
☐ Credit Card (type) _____ Card # _____ Exp Date _____
☒ Verbal Authorization Chris Scheib

☐ Standard Turn-Around Time OR ☒ Rush: Date and Time Requested: 11/26/01 (MH) am (pm)
☐ Phone Results to: _____ Phone # ( ) - - ext.
☐ Fax Results to: _____ Fax # 303-292-5411
☐ Email Results to: _____

Sample Identification	Date Sampled	Sample Medium Catalog # / Lot #	Air Sample Volume (liters)*	Analysis Requested	Method Reference
11-20-72609	11/20/01	0.8μm MCE	911.4	Lead/Arsenic	Element ICP Method 7300
11-20-72625	11/20/01		720.7		
11-20-72522	11/20/01		752.2		
~~11-20 BLANK~~	~~11/20/01~~		0		
11-20-72665	11/20/01	0.8μm MCE	0	Lead/Arsenic	Element ICP method 7300

MH 11/20/01

*For passive monitors please list time exposed in minutes.

Comments (Please list any known interferences present in sampling area): _____

Chain of Custody	Print Name	Signature	Date/Time
Relinquished by:	Matt Grant		
Received by LAB.	M. Krause	M. Krause	11/26/01 855

Samples received after 3pm will be considered as next day's business.

LAB ORIGINAL

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE/Pepsi Bottling

Date Sampled : 20-NOV-01
Date Received : 26-NOV-01
Date Analyzed : 26-NOV-01

Account No.: 13461
Login No. : L76839

Arsenic

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
11-20-72609	L76839-1	0.9114	<0.15	<0.2
11-20-72625	L76839-2	0.9207	<0.15	<0.2
11-20-72522	L76839-3	0.9522	<0.15	<0.2
11-20-72665 BLANK	L76839-4	NA	<0.15	NA

Level of quantitation: 0.15 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : see 29CFR 1910.1018
Collection Media : Filter

Submitted by: SR
Approved by : AMW
Date : 26-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE/Pepsi Bottling

Date Sampled : 20-NOV-01
Date Received : 26-NOV-01
Date Analyzed : 26-NOV-01

Account No.: 13461
Login No. : L76839

Inorganic Lead

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
11-20-72609	L76839-1	0.9114	<0.38	<0.4
11-20-72625	L76839-2	0.9207	<0.38	<0.4
11-20-72522	L76839-3	0.9522	<0.38	<0.4
11-20-72665 BLANK	L76839-4	NA	<0.38	NA

Level of quantitation: 0.38 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : 50 ug/m3
Collection Media : Filter

Submitted by: SR
Approved by : AMW
Date : 26-NOV-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

December 05, 2001

DOH ELAP# 11626

Mr. Brad Steininger
Harding ESE
1627 Cole Boulevard
Denver, CO 80401

Client Account# 13461 Login# L77055

Dear Mr. Steininger:

Enclosed are the analytical results of the samples received by our laboratory December 03, 2001.

Results in this report are based on the sampling data provided by the client. Unless otherwise requested, all samples will be discarded thirty days from the date of this report.

Please contact your client service representative, Ed Stuber at (888) 577-5227, extension 251, if you would like any additional information regarding this report.

Thank you for using Galson Laboratories.

Sincerely,

Galson Laboratories

F. Joseph Unangst
Laboratory Director

Enclosure(s)

Galson Laboratories

6601 Kirkville Road
P.O. Box 369
E. Syracuse, NY 13057
Tel: (315) 437-7252 888-577-Labs (5227)
Fax: (315) 437-0571

Request For Industrial Hygiene Analysis

Company Name: Harding ESE
Site Name: Pepsi Bottling Co.
Sampled By: Brad Steininger | Project #: 54711

Send Report to: Brad Steininger
16627 Cole Blvd
Denver, CO 80401

Invoice to: Exemplar International
Att Chris Scheib

☐ Purchase order number _____
(or)
☐ Credit Card (type) _____ Card # _____ Exp Date _____
☐ Verbal Authorization _____

☒ Standard Turn-Around Time OR ☐ Rush: Date and Time Requested: __/__/__ am pm
☐ Phone Results to: _____ Phone # ( ) - - ext.
☐ Fax Results to: _____ Fax # (303) -292-5411
☐ Email Results to: _____

Sample Identification	Date Sampled	Sample Medium Catalog # / Lot #	Air Sample Volume (liters)*	Analysis Requested	Method Reference
72648	11·29	2pc. MCE match	1016	PB/Arsenic	ICP-7300
72712	11·29		1005		
72657	11·29		990		
72493	11·29		—		
72718	11·30		773		
72709	11·30	SK	863		
72710	11·30		792		

BRS 11/30/01

*For passive monitors please list time exposed in minutes. —

Comments (Please list any known interferences present in sampling area): —

Chain of Custody	Print Name	Signature	Date/Time
Relinquished by:	Brad Steininger	Bradley R. Steininger	11/30/01 1545
Received by LAB.	M. Krause	M. Krause	12/3/01 10:30

Samples received after 3pm will be considered as next day's business.

LAB ORIGINAL

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE/Pepsi Bottling Co.
Project No. : 54711

Date Sampled : 29-NOV-01 - 30-NOV-01 Account No.: 13461
Date Received : 03-DEC-01 Login No. : L77055
Date Analyzed : 04-DEC-01

Arsenic

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
72648	L77055-1	1.016	<0.15	<0.1
72712	L77055-2	1.005	<0.15	<0.1
72657	L77055-3	0.990	<0.15	<0.2
72493 BLANK	L77055-4	NA	<0.15	NA
72718	L77055-5	0.773	<0.15	<0.2
72709	L77055-6	0.863	<0.15	<0.2
72710	L77055-7	0.792	<0.15	<0.2

Level of quantitation: 0.15 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : see 29CFR 1910.1018
Collection Media : Filter

Submitted by: JK
Approved by : AMW
Date : 05-DEC-01
QC by:
NYS DOH #: 11626

< -Less Than mg -Milligrams m3 -Cubic Meters kg -Kilograms
> -Greater Than ug -Micrograms l -Liters NS -Not Specified
NA -Not Applicable ND -Not Detected ppm -Parts per Million

Galson Laboratories

6601 Kirkville Road
E. Syracuse, NY 13057-0369
Phone: (315) 432-5227
Fax: (315) 437-0571
www.galsonlabs.com

LABORATORY ANALYSIS REPORT

Client : Exemplar International
Site : Harding ESE/Pepsi Bottling Co.
Project No. : 54711

Date Sampled : 29-NOV-01 - 30-NOV-01 Account No.: 13461
Date Received : 03-DEC-01 Login No. : L77055
Date Analyzed : 04-DEC-01

Inorganic Lead

Sample ID	Lab ID	Air Vol m3	Total ug	Conc ug/m3
72648	L77055-1	1.016	<0.38	<0.4
72712	L77055-2	1.005	<0.38	<0.4
72657	L77055-3	0.990	<0.38	<0.4
72493 BLANK	L77055-4	NA	<0.38	NA
72718	L77055-5	0.773	<0.38	<0.5
72709	L77055-6	0.863	<0.38	<0.4
72710	L77055-7	0.792	<0.38	<0.5

Level of quantitation: 0.38 ug
Analytical Method : modified NIOSH 7300; ICP
OSHA PEL (TWA) : 50 ug/m3
Collection Media : Filter

Submitted by: JK
Approved by : AMW
Date : 05-DEC-01
QC by:
NYS DOH # : 11626

< -Less Than
> -Greater Than
NA -Not Applicable
mg -Milligrams
ug -Micrograms
ND -Not Detected
m3 -Cubic Meters
l -Liters
ppm -Parts per Million
kg -Kilograms
NS -Not Specified